IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

	Roy Lee Williams, Plaintiffs,	*	Hon. Eduardo Robreno	
	v.	* *		
	John Wetzel, et al.,	• •	No. 2:21-CV-01248	
	Defendants.	*	§ 1983 Civil Rights Action	

Motion to Supplement

COMES NOW, Plaintiff Roy Lee Williams, seeking leave to supplement his Memorandum of Law in Opposition to the Defendants' Motion for Summary Judgment.

At the time the plaintiff was drafting his memorandum, he was awaiting review of his DOC medical/mental health records with his criminal attorneys. Plaintiff did subsequently review his records in-person. He flagged certain records, and a summary of those records was drafted. Unfortunately, because of a mailing error, the document itself was heavily delayed.

Plaintiff seeks to attach it now, to be considered in conjunction with his memorandum in opposition. See exhibit A. This document shows that the defendants were aware of plaintiff's history of mental health disabilities.

Roy Lee Williams

SCI Phoenix, #CF4784 1200 Mokychic Drive Collegeville, PA 19426

4-18-2022

Certificate of Service

I hereby certify that I have served this motion on counsel for the defendants via first-class U.S. Mail, on the date indicated above: Kathy Le, Esq., 1600 Arch St., 3d Floor, Phila., PA 19103

FEDERAL COMMUNITY DEFENDER OFFICE FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Capital Habeas Unit

FEDERAL COURT DIVISION - DEFENDER ASSOCIATION OF PHILADELPHIA

SUITE 545 WEST -- THE CURTIS CENTER 601 WALNUT STREET PHILADELPHIA, PA 19106

LEIGH M. SKIPPER CHIEF FEDERAL DEFENDER PHONE NUMBER (215) 928-0520 FAX NUMBER (215) 928-0826 FAX NUMBER (215) 928-3508 HELEN A. MARINO FIRST ASSISTANT FEDERAL DEFENDER

March 28, 2022

LEGAL MAIL

Roy Williams CF-4784 SCI Greene 175 Progress Drive Waynesburg, Pa 15370

Dear Roy,

Hope you are well. I have attached a summary of the psychiatric records that we reviewed during our last visit.

Take care,

Jahaan Shaheed, Esq.

Encls.

Record: SCI Graterford, Progress Note, date July 5, 1996

- Referred to psych for fashioning a noose in order to commit suicide
- Required intensive observation
- Transferred to the hard cell where he "finally stated" that he intended to manipulate the system to be in the MHU for telephone calls
- Not depressed
- May be seen on a p.r.n. basis while on J Block

Record: SCI Graterford, Initial Psychiatric Evaluation, dated January 29, 1996

- Referred to psychiatrist based on "depression and anxiety" on December 30, 1995
- Patient says that his psych history is limited to visits to the PPC when he was 13
- Since 13, patient has no psychiatric history and mental hospitalizations
- Presented no mental decompensation or emotional problems
- Placed on p.r.n. status

Record: SCI Graterford, Progress Note, dated July 3, 1996

- Notified C.O.s of voices telling him to kill himself
- Admits to fashioning a noose and hiding it behind blanket of cell
- Prozac was offered but patient declined
- Placed in hard cell in paper gown and indestructible mattress
- Patient requested a therapist
- Referred to psych department
- Suicidal ideation must be taken seriously if for no other reason than he verbalizes it
- Noose was found on J Block indiciated that patient may well have suicided but called for help

Record: Progress Notes, dated 8/8/02

- Past psychiatric history includes court ordered psychiatric treatment and an evaluation at 11 years old, 1996 evaluation at SCI Graterford for hallucination and suicidal ideation which later was perceived as "manipulation," no suicide attempts in past, no psychiatric admissions in past
- Seems worried and anxious

Name Roy Lee Williams sci- Phoenix

Number CF 4784

Collegevill MEGETA 1200 MOKYCHIC DRIVE

MAIL LEGAL

CORRECTIONS PA DEPARTMENT OF

INMATE MAIL

04/18/2022 US POSTAGE \$000.532

James A. Byrne Federal Courthouse Rm 2609 Phila, PA 19106-1797 Kate Barkman, Clerk